

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: CHRISTIAN ALVIN LEE, DEBTOR

CHAPTER 13 PROCEEDING  
CASE NO. 18-12298-JDW

**OBJECTION TO PROPOSED CHAPTER 13 PLAN AND CONFIRMATION THEREOF**

COMES NOW, Federal National Mortgage Association ("Fannie Mae") c/o Seterus, Inc., a secured creditor under 11 U.S.C. § 506 (a) & (b), in the above entitled Bankruptcy proceeding, by and through its attorney, and hereby submits the following objections to the confirmation of the Chapter 13 Plan submitted by Debtor, and in support of said objection states as follows:

I.

That this objecting secured creditor holds that certain Deed of Trust Note with an original Principal Balance of \$227,905.00 executed by the Debtor on August 19, 2005, and secured by that Deed of Trust on the residence of the Debtor, filed of record in the Office of the Chancery Clerk of DeSoto County, Mississippi in Book 2,296 at Page 237 and re-recorded in Book Modified in Book 3,093 at Page 122, and generally described as:

Lot 111, First Revision to Phase 3, Cypress Creek Plantation Subdivision, situated in Section 14 and 15, Township 2 South, Range 6 West, DeSoto County, Mississippi, according to map or plat thereof which is on file and of record in the office of the Chancery Clerk of DeSoto County, Mississippi, in Plat Book 76, Pages 46-52, to which is hereby made for a more particular description of said property.

Property Address: 3429 Cypress Plantation, Olive Branch, MS 38654

Being the same property conveyed to Michael R. Reed, by Warranty Deed, from Adventure Enterprises, Incorporated, a Mississippi Corporation, dated 4/12/2004, filed in Book 0469, Page 0702, said Register's Office.

Also being the same property conveyed to Damiano Construction, by Warranty Deed, from Michael R. Reed, dated 3/9/2005, filed in Book 496, Page 226, said Register's Office.

Also being the same property conveyed to KC Construction Contracts, LLC, by Warranty

Deed from Damiano Construction, LLC a Tennessee Limited Liability Company, dated 3/30/2005, filed in Book 498, Page 24, said Register's Office.

Being the same property conveyed to Christian A. Lee, a single man, from KC Contractors, LLC by Warranty Deed, dated 8/12/05, being recorded simultaneously herewith in the Register's Office of DeSoto County, Mississippi.

II.

That Debtor's proposed plan, docket number 9, provides for payment of the Debtor's pre-petition arrearage to Federal National Mortgage Association ("Fannie Mae") c/o Seterus, Inc. through August 31, 2018 in the amount of \$10,992.00. Upon information and belief, there is an approximate amount of prepetition arrearage owed to Federal National Mortgage Association ("Fannie Mae") c/o Seterus, Inc. in the amount of \$16,518.16.

III.

Federal National Mortgage Association ("Fannie Mae") c/o Seterus, Inc. objects to its proposed treatment under the plan in that it is a fully secured creditor upon the residence of the Debtor and its claim is not adequately protected under the terms and provisions of the proposed plan.

WHEREFORE, Federal National Mortgage Association ("Fannie Mae") c/o Seterus, Inc. respectfully requests that confirmation of the Chapter 13 plan as submitted by the Debtor be denied.

Respectfully submitted  
SHAPIRO & MASSEY, LLC

/s/ Laura Henderson-Courtney  
Laura Henderson-Courtney  
Attorney for Creditor

**CERTIFICATE OF SERVICE**

I, Laura Henderson-Courtney, of the firm of Shapiro & Massey, LLC, do hereby certify that I have this date provided a copy of the foregoing Objection either by electronic case filing or by United States mail postage pre-paid to the following:

Locke D. Barkley, Chapter 13 Trustee,  
sbeasley@barkley13.com

Jimmy E. McElroy, Attorney for the Debtor  
mcelroylawms@hotmail.com

Office of the U.S. Trustee  
[USTPRegion05.AB.ECF@usdoj.gov](mailto:USTPRegion05.AB.ECF@usdoj.gov)

Christian Alvin Lee  
3429 Cypress Plantation  
Olive Branch, MS 38654

Dated: August 9, 2018

Respectfully submitted  
SHAPIRO & MASSEY, LLC

/s/ Laura Henderson-Courtney  
Laura Henderson-Courtney  
Attorney for Creditor

Presented by:  
J. Gary Massey, MSB#1920  
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